

# **EXHIBIT**

**A**

Re: Hogan

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From: Paul De Marco (demarcoworld@yahoo.com)  
To: tonycicero@gocicero.com; bill@klausmanlawltd.com  
Date: Wednesday, September 20, 2023 at 03:29 PM EDT

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Hi Tony and Bill,

You can always reach me on my cellphone (see below). Mailing me flash drives is fine. Please note my firm's address changed a while back to 119 East Court Street, Suite 530, Cincinnati, OH, 45202.

We're eager to receive what the Court ordered your clients to produce to us in both the August 2 order and the September 6 order. So far, as you know, we have received nothing from your clients in response to those two orders. The August 2 order set a deadline of September 1, and the September 6 order set a deadline of today, September 20. Because these were court-ordered deadlines, we're uncomfortable granting extensions on our own, so you will need to move for any extensions you need to fulfill these orders. Given that the information your clients need to comply with the September 6 order should be contained in the clubs' Lease Agreements, we think 21 additional days is excessive. Our position (which would be contained in our response to your motions) is that we believe 21 days in addition to the 14 days already allowed is excessive but that if you each ask for an additional 14 days to comply with the September 6 order, plaintiffs would not object to the 14-day extension as long as we receive the required lists by the extended deadline (as opposed to being given reasons why your clients cannot or should not have to produce them) and as long as we receive by the same deadline the documents that the Court ordered your clients to produce by September 1.

Thanks, Tony and Bill.

Paul

Paul M. De Marco  
ph. 513-470-0369  
demarcoworld@yahoo.com

On Wednesday, September 20, 2023 at 12:13:30 PM EDT, Tony Cicero <tonycicero@gocicero.com> wrote:

Paul,

I'm copying in Bill because he and I have discussed filing objections to the 10/6 decision. I do not think we will, but we need additional time to comply with the Magistrate's Order. Are you OK with 21 days? I'm not sure that will be enough, but

it's a good start. Bill needs time to look to see if he has email addresses, I need to do that with some of my clients, and also need time to put together complete lists for the clubs that have email addresses. I have a list done for Cheeks from the data I have, but it doesn't cover the entire time period.

In regard to the Judge's Order from 8/2, I will give you what I have redacted from Cheeks, which is everything I previously told you about. I should know soon if they have more, but I do not know about the other clubs yet. In re Cheeks, do you want to share a folder out to me in Dropbox? or some other online service? I was going to share a SharePoint folder with you but I don't want to put that much info on our server. Or, I can copy to flash drives and mail.

I tried calling you to discuss but could not get through on your office phone number. Do you have another good contact #?

Thanks and let me know.

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